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April 11, 2001

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Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: Request of the U.S. Territory of American Samoa to
Participate in the North American Numbering Plan and for
Assignment of NPA Code 684;
Policy and Rules Concerning the Interstate, Interexchange
Marketplace; Implementation of Section 254(g) of the
Communications Act of 1934, as amended, CC Docket No. 96-61**

Dear Ms. Salas:

On behalf of the American Samoa Telecommunications Authority ("ASTCA"), I am enclosing a letter from America Samoa Governor Tauese P.F. Sunia requesting permission to participate in the North American Numbering Plan and for Assignment of NPA Code 684. This also updates the record regarding the American Samoa Rate Integration Plan filed in the above-referenced proceeding.

Please contact me if you have any questions.

Respectfully submitted,



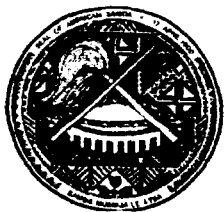
David L. Sieradzki
Counsel for the American Samoa
Telecommunications Authority

Enclosures

cc: Dorothy Attwood, Chief, Common Carrier Bureau
Diane Griffith Harmon, Acting Chief, Network Services Division, CCB
Cheryl Callahan, Network Services Division, CCB
John R. Hoffman, Chairman, North American Numbering Council
Fagafaga Langkilde, Vice President, Blue Sky Communications
Ron Connors, Director, North American Numbering Plan Administration

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TERRITORY OF AMERICAN SAMOA
OFFICE OF THE GOVERNOR
 PAGO PAGO, AMERICAN SAMOA 96799



Serial: 0559

TAUESE P. F. SUNIA
 Governor

TOGIOLA T. A. TULAFONO
 Lieutenant Governor

March 23, 2001

Ron Conners
 Director
 North American Numbering Plan Administration
 Neustar, Inc.
 1120 Vermont Ave., N.W., Suite 400
 Washington, D.C. 20005

**Re: Request of the U.S. Territory of American Samoa to Participate
 in the North American Numbering Plan and for Assignment of
 NPA Code 684**

Dear Mr. Conners:

I am writing to request that the U.S. territory of American Samoa be allowed to participate in the North American Numbering Plan ("NANP"), like other U.S. states and territories. To facilitate this participation, I respectfully request the assignment to American Samoa of NPA code 684, which corresponds to the international dialing code now in use.

American Samoa, with a population of approximately 58,000, has been an unincorporated territory of the United States since 1900. The American Samoa Government ("ASG"), composed of an elected governor, legislature, and other self-governing institutions, governs the territory subject to the authority of the U.S. Department of the Interior. As Governor, I function as the Telecommunications Regulatory Commissioner, with authority to regulate the local operations of telecommunications carriers.

The American Samoa Telecommunications Authority ("ASTCA"), an independently operated, quasi-governmental entity that is owned by ASG, is the oldest and largest telecommunications carrier in American Samoa, and provides local exchange, long distance, and wireless service throughout the territory.

In a July 1997 order, the FCC's Common Carrier Bureau strongly encouraged American Samoa to participate in the North American Numbering Plan, in order to facilitate carriers' implementation of rate integration requirements of Section 254(g) of the Communications Act of 1934, as amended ("Act"), and to promote competition and introduction of new services. The Bureau stated:

We note that there are several measures that could be implemented in American Samoa that likely would facilitate the ability of interexchange carriers to integrate their service offerings to American Samoa with their interstate offerings to the mainland and other offshore points. These steps include participation in the North American Numbering Plan, provision of access services to IXC's on a basis comparable to that of LEC's in other parts of the U.S. (such as by offering National Exchange Carrier Association access rates), and provision of Feature Group D service if requested by IXC's. Thus, inclusion of American Samoa in the NANP would help carriers integrate American Samoa into their nationwide service plans, billing systems, and switching mechanisms. Implementation of Feature Group D service would provide subscribers with high-quality equal access to providers of interexchange service serving American Samoa. Provision of access services by American Samoa to interexchange carriers on a basis more comparable to such services provided in other parts of the U.S. could help interexchange carriers set rates at integrated levels. Further, these measures could promote the provision of competitive services to American Samoa and stimulate introduction of new services. * * * We encourage American Samoa to submit a complete plan for taking these and any other measures that could help to integrate provision of communications services to American Samoa.

Policy and Rules Concerning the Interstate, Interexchange Marketplace; Implementation of Section 254(g) of the Communications Act of 1934, as amended, 12 FCC Rcd 11548, 11558, ¶¶ 21-22 (Com. Car. Bur. 1997).

In response to that order, ASG filed a Rate Integration Plan for American Samoa on October 1, 1997. In that plan, ASG proposed to remain outside the NANP, due to the high cost of upgrading ASTCA's switches. But ASG proposed to have ASTCA take a number of other steps that would regularize its status under the FCC's regulations, including: (1) reduce its long distance rates and achieve full rate integration of its out-bound domestic long-distance calls; (2) provide interstate access service under the tariffs of the National Exchange Carrier Association ("NECA"); (3) contribute to the federal universal service funds, and receive low-income and high-cost rural support from those funds; (4) obtain an international 214 certificate; and (5) negotiate and, if necessary, arbitrate interconnection arrangements with prospective local competitors pursuant to Sections 251 and 252 of the Act.

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During the three and a half years since the plan was filed, ASTCA has taken all of the steps listed above. See, e.g., *American Samoa Government and The American Samoa Telecommunications Authority*, 14 FCC Rcd 9974 (Accounting Policy Div., Com. Car. Bur. 1999) (granting waivers to enable ASTCA to join NECA and receive universal service funds). At this point, American Samoa is in a position to participate in the NANP.

Without participation in the NANP, ASTCA cannot obtain or use Carrier Identification Codes ("CICs"), and therefore cannot fully implement equal access. As noted above, in 1997 the Common Carrier Bureau strongly encouraged American Samoa to participate in the NANP and urged ASTCA to provide equal access. Over the past few years, ASTCA has continued to upgrade its switches in an effort to provide various FCC-mandated services and to improve service to its subscribers. ASTCA's switching equipment is now capable of providing equal access. Equal access is important to facilitate competition by a new entrant in American Samoa, Blue Sky Communications, and possibly by other interexchange carriers. ASG wants to bring the benefits of long distance competition to the people of American Samoa; and pursuant to the FCC's rules, ASTCA is now required to provide equal access in response to Blue Sky's *bona fide* request. But ASTCA cannot satisfy this requirement unless American Samoa joins the NANP.

Accordingly, I respectfully request authority for the U.S. territory of American Samoa to participate in the NANP, as the Common Carrier Bureau suggested several years ago. To facilitate this, an NPA code needs to be assigned to American Samoa. It would greatly simplify the transition process for residents and businesses in American Samoa, and their relatives and other contacts who call them, if the currently unused NPA code of 684 could be assigned to American Samoa, matching American Samoa's current international "country" code. I understand that this NPA code already has been informally set aside for some years in anticipation of its possible assignment to American Samoa.

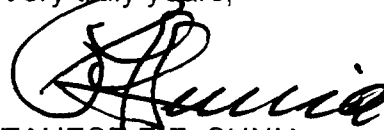
This request is fully supported by precedent. In 1997, when the U.S. territories of Guam and the Commonwealth of the Northern Mariana Islands ("CNMI") began to participate in the NANP, those territories were assigned NPA codes identical to their pre-existing international country codes. American Samoa requests the same treatment.

In sum, permitting American Samoa to participate in the NANP, and assigning the 684 NPA code to American Samoa, would provide benefits to subscribers in American Samoa and throughout the United States. These steps will: (1) facilitate ASTCA's provision of equal access and promote competitive entry; (2) enable U.S. carriers to comply fully with the geographic rate integration requirements of Section

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254(g) of the Act; and (3) minimize the difficulty of the transition for American Samoa consumers and other Americans who call them by assigning an NPA code matching the current country code.

Very truly yours,

A handwritten signature in black ink, appearing to read "Tauese", written over a circular stamp or seal.

TAUESE P.F. SUNIA
Governor

cc: Dorothy Attwood, *Chief, Common Carrier Bureau, FCC*
John R. Hoffman, *Chairman, North American Numbering Council*
Aleki Sene, *Executive Director, American Samoa Telecommunications Authority*
Fagafaga Langkilde, *Vice President, Blue Sky Communications*